

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Procedures to Identify and Resolve Location)	WC Docket No. 10-90
Discrepancies in Eligible Census Blocks)	
Within Winning Bid Areas)	
)	

COMMENTS OF CALIFORNIA INTERNET, L.P. DBA GEOLINKS

California Internet, L.P. DBA GeoLinks (“GeoLinks” or the “Company”) submits these comments on the Public Notice released by the Wireline Competition Bureau (“Bureau”) regarding procedures to identify and resolve location discrepancies in eligible census blocks within Connect America Fund Phase II (“CAF II”) winning bid areas on September 10, 2018.¹

I. INTRODUCTION

GeoLinks is proud to service the largest coverage area of any single fixed wireless Internet service provider in the state the California. GeoLinks participated in the CAF II Auction, securing funding to serve 3883 Census Blocks (in 242 Census Blocks Groups) in California and Nevada. GeoLinks urges the Bureau to create a straightforward process for resolving location discrepancies that may exist in Phase II auction support areas and provides the following recommendations.

II. DISCUSSION

A. Reliability and Validity of Data

In the Public Notice, the Bureau seeks comment on whether to require participants to use a particular method to identify the geocoordinates and addresses of actual locations or permit carriers to choose their method(s) and correct for inaccuracies.² While GeoLinks understands

¹ Public Notice, “Wireline Competition Bureau Seeks Comment on Procedures to Identify and Resolve Location Discrepancies in Eligible Census Blocks Within Winning Bid Areas,” WC Docket No. 10-90, DA 18-929 (rel. Sept. 10, 2018) (“Public Notice”).

² See Public Notice at 11.

the Bureau's interest in securing accurate location identification information, the Company urges the Bureau not to limit a broadband provider's ability to determine what methodology may work best for the provider to gather this information.

As an initial matter, it behooves a CAF II support recipient to accurately identify where within its award area actual locations are. This is necessary in order for the recipient to effectively and efficiently develop and execute a network deployment plan that will ensure it meets all of its CAF II requirements. However, there are many ways to go about identifying the geocoordinates or addresses of eligible locations. As the Public Notice explains, "USAC has published guidance on three generally accepted methods of geolocation, i.e., (1) GPS in the field, (2) desktop geolocation using web-based maps and imagery, and (3) automated address geocoding."³ However, it also explains that "each of these methods will produce variable levels of accuracy."⁴ As such, GeoLinks believes that the broadband provider should be able to select the methodology that it believes to be the most accurate for verifying locations within an eligible area so long as it is able to provide a narrative that sufficiently explains said methodology and the results.

Depending on the specific characteristics of the eligible areas the provider plans to serve, certain methodologies may be more accurate, efficient, cost effective, etc. than others. For example, in some areas, a provider may choose to implement aerial photography to verify locations. In others, it may choose to have a technician scout an area on foot. And in others, there may be other sources of data available that the provider can utilize. Further, a combination of methodologies may be the most effective strategy for some areas (e.g. those with difficult terrain or heavy vegetation). For these reasons, GeoLinks asserts that so long as a location is verified by the provider and the methodology (or combination thereof) for verification can be sufficiently explained, the Bureau should not limit a provider's use of any such methods.

B. Relevant Stakeholder's Evidence

In the Public Notice, the Bureau seeks comment on how it should define "relevant stakeholders" and what evidence must be submitted by these stakeholders in order to carry out

³ Public Notice at 11.

⁴ *Id.*

the Commission's mandate that relevant stakeholders have the opportunity to review and comment on location information provided by CAF II recipients.⁵ As an initial matter, GeoLinks believes that "relevant stakeholders" should be limited to individuals residing within the relevant support area.⁶ This is critical to ensure that the FCC obtain information from those most likely to have firsthand knowledge of the locations within a support area, where those locations are, and whether a CAF II awardee has accurately reported those locations.

In allowing these stakeholders to file comments, GeoLinks urges the Bureau to require certain information to ensure they are, in fact, relevant stakeholders and are providing verifiable information regarding the accuracy of a CAF II recipient's location data. First, the Bureau should require that any such commenter provide proof that the individual (or represented individual) resides in the support area and a certification that the commenter is not associated with a competitor. Second, the Bureau should require commenters to provide a narrative that sufficiently explains how a CAF II recipient's location data is inaccurate or incomplete and the methodology used to make that determination. GeoLinks believes that this information, at a minimum, is necessary to ensure a process that will assist the Bureau in verifying the accuracy of location data that may be provided by CAF II recipients.

III. CONCLUSION

In order to ensure a straightforward process for resolving location discrepancies that may exist in Phase II auction support areas, GeoLinks urges the Bureau to adopt the foregoing recommendations.

Respectfully submitted,

GEOLINKS, LLC

/s/ Skyler Ditchfield, Chief Executive Officer
/s/ Melissa Slawson, General Counsel/ V.P of Government
Affairs and Education

October 29, 2018

⁵ See Public Notice at 13 and 14.

⁶ The Company agrees with the Bureau's proposal that state and local authorities and Tribal governments should be allowed to file comments on behalf of such individuals. *See* Public Notice at 13.